

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

12

JAD 05/00 1337

Eagle Signal DN.

AUG 18 1982

Mr. Ron Kolpa
Chief, Land Program Development
Iowa Department of Environmental Quality
Henry A. Wallace Building
Des Moines, Iowa 50319

Enclosed you will find the Resource Conservation and Recovery Act (RCRA) Subpart H Financial Requirement submissions for several Iowa facilities.

These financial instruments and documents were addressed to the Environmental Protection Agency (EPA) in accordance with the Federal Registers of April 7 and 16, 1982, concerning financial assurance and third party liability requirements effective July 6 and 15, 1982.

Since Iowa has received Phase I Interim Authorization which covers these regulations, the EPA, Permits Section, is referring these documents to your office. By copy of this letter we are notifying the facilities on the enclosed list that their financial documents were forwarded to the appropriate State office for processing in accordance with the State financial requirements.

If you have further questions, please contact Midge Given at (816) 374-6531.

Sincerely yours,

Robert L. Morby
Chief, Waste Management Branch
Air and Waste Management Division

Enclosures

cc: Facilities on Enclosed List

bcc: Jack Coakley, SPRS

RCRA



551131

ARWM/WMBR-PMTS-MCiven:lmh:x6531:8-13-82-Disk J-13

CONCURRENCES

| | | | | | | | |
|---------|-------|------------|-------|--|--|--|--|
| BOL | PMTS | PMTS | WMBR | | | | |
| SURNAME | Given | Harrington | Morby | | | | |
| DATE | 1/14 | 8/14 | 8/14 | | | | |

EPA Form 1320-1 (12-70)

OFFICIAL FILE COPY

IDEQ
Copy EPA

Hazardous Waste Facility Certificate of Liability Insurance

This certifies to:

PERMIT CONTACT
PERMITS BRANCH
U.S. ENVIRONMENTAL PROTECTION AGENCY
324 EAST 11TH STREET
KANSAS CITY, MISSOURI 64106

RECEIVED

JUL 20 1982

WATER COMPLIANCE BRANCH

1. The Aetna Casualty and Surety Company, (The "Insurer"), of
151 Farmington Avenue
Hartford, Connecticut 06156

hereby certifies that it has issued liability insurance covering bodily
injury and property damage to

GULF + WESTERN INDUSTRIES, INC., (the "Insured"), of
(Name of Insured)

ONE GULF + WESTERN PLAZA
(Address)

NEW YORK, NY 10023

in conjunction with the insured's obligation to demonstrate financial
responsibility under 40 CFR 264.147 or 265.147. The coverage applies at

EAGLE SIGNAL DIVISION
(Name of Facility)

736 FEDERAL STREET, DAVENPORT, IA. 52803
(Address)

IAD 051001337
(EPA Identification Number)

for ☒ (X) sudden accidental occurrences
☐ () non-sudden accidental occurrences

The insurance hereby certified is either primary or excess insurance,
as indicated by "X" for the limits shown;

(X) The Insurance hereby certified is primary and the Insurer shall
not be liable for amounts in excess of \$ 1,000,000 per each occurrence/per
each claim/per pollution incident, \$ 5,000,000 annual aggregate,
exclusive of legal defense costs.

() The insurance hereby certified is excess and the Insurer will not
be liable for amounts in excess of \$ _____ per each occurrence/per
each claim/per pollution incident, \$ _____ annual aggregate,
exclusive of legal defense costs, in excess of the underlying limits
of \$ _____ per each occurrence/per each claim/per pollution
incident, \$ _____ annual aggregate, exclusive of legal defense
costs.

Ex. 4

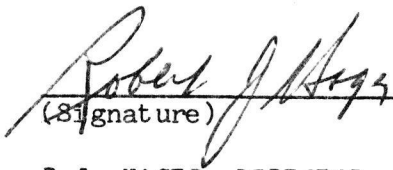
The coverage is provided under policy number , issued
on 1-1-82. The effective date of said policy is 1-1-82.

TO →
File →
for →

2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1.

- (a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.
- (b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.147(f).
- (c) Whenever requested by a Regional Administrator of the U.S. Environmental Protection Agency (EPA), the Insurer agrees to furnish to the Regional Administrator a signed duplicate original of the policy and all endorsements.
- (d) Cancellation of the insurance, whether by the Insurer or the Insured, will be effective only upon written notice and only after the expiration for sixty (60) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.
- (e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.

I hereby certify that the wording of this instrument is identical to the wording specified in 40 C FR 264.151(i) as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines Insurer, in one or more States.


(Signature)

R.J. HAGER, DIRECTOR

Name & Title of Authorized Representative
of Aetna Casualty & Surety Co.

151 FARMINGTON AVE., HARTFORD, CT
Address of Representative

Gulf Western Industries, Inc.

1 GULF-WESTERN PLAZA
NEW YORK, N. Y. 10023
212-333-4340

NORMAN R. FORSON
SEN. OR VICE PRESIDENT
AND TREASURER

Gary Gosbee, Waste Management Branch
Region I
John F. Kennedy Building
Boston, Massachusetts 02203

Anthony Donatoni, Hazardous
Materials Branch
Region III
6th and Walnut Streets
Philadelphia, Pennsylvania 19106

Thomas B. Golz, Waste Management
Branch
Region V
230 South Dearborn Street
Chicago, Illinois 60604

Robert L. Morby, Chief
Hazardous Materials Branch
Region VII
324 E. 11th Street
Kansas City, Missouri 64106

Helen S. Beggan, Chief
Region II
Grants Administration Branch
26 Federal Plaza
New York, New York 10007

Dan Thoman, Residuals
Management Branch
Region IV
345 Courtland Street, N. E.
Atlanta Georgia 30308

Henry Onsgard, Attention: RCRA
Financial Requirements
Region VI
1201 Elm Street
First International Building
Dallas, Texas 75270

Richard Procunier, Hazardous
Materials Branch
Region IX
215 Fremont Street
San Francisco, Calif. 94105

I am the chief financial officer of Gulf & Western Industries, Inc. This letter is in support of this firm's use of the financial test to demonstrate financial assurance, as specified in Subpart H of 40 CFR Parts 264 and 265.

1. This firm is the owner or operator of the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post closure cost estimates covered by the test are shown for each facility: None.

2. The firm guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure or post-closure care of the following facilities owned or operated by subsidiaries of this firm. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility:

- 1) ELCO-VARICIRCUITS Division of Gulf & Western Manufacturing Company
9268 Commerce Highway
Pennsauken, New Jersey 08110
EPA I.D. NO. NJDO69016954
ESTIMATED CLOSURE COST: \$3,897.00
- 2) TAYLOR FORGE STAINLESS Division of Gulf & Western Manufacturing Company
Reading Road, North Branch
Somerville, New Jersey 08876
EPA I.D. NO. NJDO63144174
ESTIMATED CLOSURE COST: \$96,505.00
- 3) FURNITURE CITY MANUFACTURING Division of Gulf & Western Manufacturing Company
2555 Oak Ind. Drive, N. E.
Grand Rapids, Michigan 49505
EPA I.D. NO. MIDO55850200
ESTIMATED CLOSURE COST: \$156,327.00
- 4) FURNITURE CITY MANUFACTURING Division of Gulf & Western Manufacturing Company
33 State Street
Middletown, Michigan 49333
EPA I.D. NO. MIDO60197662
ESTIMATED CLOSURE COST: \$12,527.00
- 5) MICHIGAN PLATING & STAMPING Division of Gulf & Western Manufacturing Company
1860 Alpine Avenue, N. W.
Grand Rapids, Michigan 49504
EPA I.D. NO. MIDO55850127
ESTIMATED CLOSURE COST: \$166,748.00
- 6) G&W STAMPING Division of Gulf & Western Manufacturing Company
90-96 Railroad Street
Mancelona, Michigan 49659
EPA I.D. NO. MIDO60178688
ESTIMATED CLOSURE COST: \$218,180.00
ESTIMATED POST-CLOSURE COST: \$4,169.00
- 7) G&W STAMPING Division of Gulf & Western Manufacturing Company
117 South Lake Street
East Jordan, Michigan 49727
EPA I.D. NO. MIDO60178092
ESTIMATED CLOSURE COST: \$4,325.00

- 8) MONROE STEEL CASINGS Division of Gulf & Western Manufacturing Company
917 West Front Street
Monroe, Michigan 48161
EPA I.D. NO. MID020277760
ESTIMATED CLOSURE COST: \$51,275.00
- 9) BOHN ALUMINUM & BRASS Division of Gulf & Western Manufacturing Company
Aylesworth and Indiana
South Haven, Michigan 49090
EPA I.D. NO. MID052866878
ESTIMATED CLOSURE COST: \$28,660.00
- 10) BOHN ALUMINUM & BRASS Division of Gulf & Western Manufacturing Company
Route #6 West
Butler, Indiana 46721
EPA I.D. NO. INDO52867363
ESTIMATED CLOSURE COST: \$52,786.00
- 11) BOHN ALUMINUM & BRASS Division of Gulf & Western Manufacturing Company
320 Center Street
South Haven, Michigan 49090
EPA I.D. NO. MID000775999
ESTIMATED CLOSURE COST: \$11,151.00
- 12) BOHN ALUMINUM & BRASS Division of Gulf & Western Manufacturing Company
East Maumee and Wabash Railroad
Adrian, Michigan 49221
EPA I.D. NO. MID063705990
ESTIMATED CLOSURE COST: \$110,940.00
- 13) BOHN ALUMINUM & BRASS Division of Gulf & Western Manufacturing Company
Route #4, Post Office Box 387
Greensburg, Indiana 47240
EPA I.D. NO. INDO52959640
ESTIMATED CLOSURE COST: \$391,087.00
- 14) BOHN ALUMINUM & BRASS Division of Gulf & Western Manufacturing Company
365 West 24th Street
Holland, Michigan 49423
EPA I.D. NO. MID020899985
ESTIMATED CLOSURE COST: \$38,771.00
- 15) BOHN METALS Division of Gulf & Western Manufacturing Company
875 Brooks Avenue
Holland, Michigan 49423
EPA I.D. NO. MID000810663
ESTIMATED CLOSURE COST: \$7,256.00

3. In States where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 or 265, this firm, as owner or operator or guarantor, is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility:

- 1) TAYLOR FORGE Division of Gulf & Western Manufacturing Company
4735 West 14th Street
Cicero, Illinois 60650
EPA I.D. NO. ILDO43905504
ESTIMATED CLOSURE COST: \$6,774.00
- 2) BOHN ALUMINUM & BRASS Division of Gulf & Western Manufacturing Company
1625 East Voorhees Street
Danville, Illinois 61832
EPA I.D. NO. ILDO65247355
ESTIMATED CLOSURE COST: \$1,563.00
- 3) EAGLE SIGNAL Division of Gulf & Western Manufacturing Company
925 Lake Street
Baraboo, Wisconsin 53913
EPA I.D. NO. WIDO23146558
ESTIMATED CLOSURE COST: \$2,302.00
- 4) EAGLE SIGNAL Division of Gulf & Western Manufacturing Company
8004 Cameron Road
Austin, Texas 78753
EPA I.D. NO. TXDO30314618
ESTIMATED CLOSURE COST: \$2,084.00

4. This firm is the owner or operator of the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility:

- 1) COLLYER INSULATED WIRE Division of Gulf & Western Manufacturing Company
100 Higginson Avenue
Lincoln, Rhode Island 02865
EPA I.D. NO. RIDO51507648
ESTIMATED CLOSURE COST: \$15,633.00
- 2) MORSE CUTTING TOOLS Division of Gulf & Western Manufacturing Company
163 Pleasant Street
New Bedford, Massachusetts 02742
EPA I.D. NO. MAD051505683
ESTIMATED CLOSURE COST: \$40,905.00

- 3) NORTH & JUDD Division of Gulf & Western Manufacturing Company
699 Middle Street
Middletown, Connecticut 06457
EPA I.D. NO. CTD051320372
ESTIMATED CLOSURE COST: \$37,969.00
ESTIMATED POST-CLOSURE COST: \$5,211.00
- 4) NORTH & JUDD Division of Gulf & Western Manufacturing Company
56 Pameacha Avenue
Middletown, Connecticut 06457
EPA I.D. NO. CTD000115618
ESTIMATED CLOSURE COST: \$2,605.00
- 5) ELCO HUNTINGDON Division of Gulf & Western Manufacturing Company
Huntingdon Industrial Park
Huntingdon, Pennsylvania 16652
EPA I.D. NO. PADO0309461
ESTIMATED CLOSURE COST: \$5,211.00
- 6) BONNEY FORGE Division of Gulf & Western Manufacturing Company
827-31 North Meadow Street
Allentown, Pennsylvania 18105
EPA I.D. NO. PADO47354287
ESTIMATED CLOSURE COST: \$4,168.00
- 7) BONNEY FORGE Division of Gulf & Western Manufacturing Company
18th and Penn Street
Huntingdon, Pennsylvania 16652
EPA I.D. NO. PADO05381538
ESTIMATED CLOSURE COST: \$834.00
- 8) GLASGOW INDUSTRIES Division of Gulf & Western Manufacturing Company
1115 Cleveland Avenue
Glasgow, Kentucky 42141
EPA I.D. NO. KYDO08964934
ESTIMATED CLOSURE COST: \$52,422.00
- 9) TAYLOR FORGE Division of Gulf & Western Manufacturing Company
5577 Taylor Drive
Memphis, Tennessee 38127
EPA I.D. NO. TND070769831
ESTIMATED CLOSURE COST: \$14,591.00

- 10) TAYLOR FORGE Division of Gulf & Western Manufacturing Company
Highway 12, West Business Route
Ackerman, Mississippi 39735
EPA I.D. NO. MSD067116178
ESTIMATED CLOSURE COST: \$26,054.00
- 11) EAGLE SIGNAL Division of Gulf & Western Manufacturing Company
736 Federal Street
Davenport, Iowa 52803
EPA I.D. NO. IAD051001337
ESTIMATED CLOSURE COST: \$3,606.00
- 12) ELCO-PACIFIC Division of Gulf & Western Manufacturing Company
2250 Park Place
El Segundo, California 90245
EPA I.D. NO. CAD048340699
ESTIMATED CLOSURE COST: \$1,563.00
- 13) H. KOCH & SONS Division of Gulf & Western Manufacturing Company
5410 East LaPalma Avenue
Anaheim, California 92807
EPA I.D. NO. CAD066146481
ESTIMATED CLOSURE COST: \$10,422.00

This firm is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this firm ends on July 31. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year, ended July 31, 1981.

THE FINANCIAL TEST

Alternative I

| | |
|--|------------------------|
| 1. Sum of Current Closure and Post-Closure Cost Estimates | |
| * 2. Total Liabilities | \$ 1,588,521 |
| * 3. Tangible Net Worth | 3,714,186,000 |
| * 4. Net Worth | 2,047,340,000 |
| * 5. Current Assets | 2,179,038,000 |
| * 6. Current Liabilities | 2,908,349,000 |
| * 7. Net Working Capital (line 5 minus line 6) | 1,438,188,000 |
| * 8. The Sum of Net Income plus Depreciation, Depletion and Amortization | 1,470,161,000 |
| * 9. Total Assets in United States | 407,422,000 |
| | 4,745,900,000 - Note A |

| | | |
|---|---------------|---------------|
| | <u>Yes</u> | <u>No</u> |
| 10. Is line 3 at least \$10 million? | <u>X</u> | <u> </u> |
| 11. Is line 3 at least 6 times line 1? | <u>X</u> | <u> </u> |
| 12. Is line 7 at least 6 times line 1? | <u>X</u> | <u> </u> |
| 13. Are at least 90% of firm's assets located in the United States? If not, complete line 14. | <u> </u> | <u>X</u> |
| 14. Is line 9 at least 6 times line 1? | <u>X</u> | <u> </u> |
| 15. Is line 2 divided by line 4 less than 2.0? | <u>X</u> | <u> </u> |
| 16. Is line 8 divided by line 2 greater than 0.1? | <u>X</u> | <u> </u> |
| 17. Is line 5 divided by line 6 greater than 1.5? | <u>X</u> | <u> </u> |

Note A - includes assets in Puerto Rico

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(f) as such regulations were constituted on the date shown immediately below.

Norman R. Forson
NORMAN R. FORSON,
Senior Vice President, Treasurer &
Assistant Secretary
GULF & WESTERN INDUSTRIES, INC.
July 1, 1982
[DATE]

P. S.: Some facilities listed in paragraph 4. of this letter are located in states which are now in the process of implementing thier own financial assurance requirments. As these requirements are finalized, the appropriate filings will be made with the state agencies

Ernst & Whinney

153 East 53rd Street
New York, New York 10022

212/888-9100

July 1, 1982

Gulf + Western Industries, Inc.
1 Gulf + Western Plaza
New York, New York 10023

Attention Mr. Robert L. Jones
Senior Vice President
Resident Counsel & Secretary

Data Contained in Letter to EPA Regional Administrators

Gentlemen:

We have examined the consolidated balance sheet of Gulf + Western Industries, Inc. and consolidated subsidiaries as of July 31, 1981 and the related consolidated statements of earnings, changes in capital accounts and changes in financial position for the year then ended, and have issued our report thereon dated October 21, 1981. Our examination was made in accordance with generally accepted auditing standards and, accordingly, included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances.

At your request, we have read the letter dated July 1, 1982 from Mr. Norman R. Forson as Chief Financial Officer of Gulf + Western Industries, Inc. directed to the EPA Regional Administrators as part of Gulf + Western Manufacturing Company's demonstration of financial assurance of closure and post-closure care under Parts 264 and 265 of the Code of Federal Regulations ("Standards Applicable to Owners and Operators of Hazardous Waste Treatment, Storage and Disposal Facilities"). We have compared the data specified in that letter as having been derived from the independently audited, year-end financial statements of Gulf + Western Industries, Inc. for the year ended July 31, 1981 with the amounts in such financial statements.

As a result of the above procedures, no matters have come to our attention which cause us to believe that the specified data should be adjusted.

Very truly yours,

Ernst & Whinney

ERNST & WHINNEY

Gulf Western Industries, Inc.

TO
Midg.
TDEQ
1 GULF WESTERN PLAZA
NEW YORK, N. Y. 10023
212 333 4940

ROBERT L. JONES
SENIOR VICE PRESIDENT
RESIDENT COUNSEL

July 1, 1982

Mr. Robert L. Morby, Chief
Hazardous Materials Branch
Region VII
324 E. 11th Street
Kansas City, Missouri 64106

RE: EPA STANDARDS APPLICABLE TO OWNERS AND OPERATORS
OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL
FACILITIES: CORPORATE GUARANTEE OF CLOSURE AND
POST-CLOSURE CARE

Dear Mr. Morby:

Enclosed are the following documents furnished to you in accordance with the EPA regulations regarding Gulf & Western Manufacturing Company's obligation to provide financial assurance that, at such time as any of the affected facilities close, sufficient funds will be available to insure that all hazardous waste on-site will be removed or disposed of in accordance with the regulations:

1. Corporate Guarantee by Gulf & Western Industries, Inc. of the obligations of its subsidiary, Gulf & Western Manufacturing Company.
2. Letter from the Chief Financial Officer of Gulf & Western Industries, Inc., Mr. Norman R. Forson.
3. Report from Gulf & Western Industries, Inc.'s independent auditors, Ernst & Whinney.

HM/SWMG

JUL 6 1982

Region VII K.C., MO

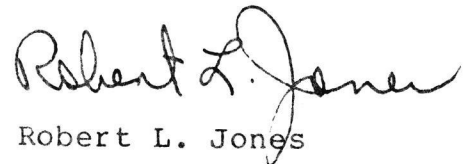
L.H.

July 1, 1982
Page 2

4. Annual report of Gulf & Western Industries, Inc. for its most recent fully-completed year which ended July 31, 1981 and which contains copies of the certified financials of Gulf & Western Industries, Inc.

If you have any questions concerning the enclosed, please contact Mr. Michael J. Bauer, Associate Counsel, Gulf & Western Manufacturing Company, 26261 Evergreen Road, Southfield, Michigan 48037, telephone number (313) 355-8105.

Yours very truly,

A handwritten signature in cursive script, appearing to read "Robert L. Jones".

Robert L. Jones

RLJ/ly
Enclosures

CORPORATE GUARANTEE FOR CLOSURE .

OR

POST-CLOSURE CARE

Guarantee made this 21 day of July, 1982 by Gulf & Western Industries, Inc., a business corporation organized under the laws of the State of Delaware, herein referred to as guarantor, to the United States Environmental Protection Agency (EPA), obligee, on behalf of our subsidiary Gulf & Western Manufacturing Company of 26261 Evergreen Road, Southfield, Michigan 48037.

Recitals

1. Guarantor meets or exceeds the financial test criteria and agrees to comply with the reporting requirements for guarantors as specified in 40 CFR 264.143(f), 264.145(f), 265.143(e), and 265.145(e).

2. Gulf & Western Manufacturing Company owns or operates the following hazardous waste management facilities covered by this guarantee: See attached list.

3. "Closure plans" and "post-closure plans" as used below refer to the plans maintained as required by Subpart G of 40 CFR Parts 264 and 265 for the closure and post-closure care of facilities as identified above.

4. For value received from Gulf & Western Manufacturing Company, guarantor guarantees to EPA that in the event that Gulf & Western Manufacturing Company fails to perform "closure and post-closure care of the above facilities in accordance with the closure or post-closure plans and other permit or interim status requirements whenever required to do so, the guarantor shall do so or establish a trust fund as specified in Subpart H of 40 CFR Parts 264 or 265, as applicable, in the name of Gulf & Western Manufacturing Company in the amount of the current closure or post-closure cost estimates as specified in Subpart H of 40 CFR Parts 264 and 265.

5. Guarantor agrees that if, at the end of any fiscal year before termination of this guarantee, the guarantor fails to meet the financial test criteria, guarantor shall send within 90 days, by certified mail, notice to the EPA Regional Administrators for the Regions in which the facilities are located and to Gulf & Western Manufacturing Company that he intends to provide alternate financial assurance as specified in Subpart H of 40 CFR Parts 264 or 265, as applicable, in the name of Gulf & Western Manufacturing Company. Within 120 days after the end of such fiscal year, the guarantor shall establish such financial assurance unless Gulf & Western Manufacturing Company has done so.

6. The guarantor agrees to notify the EPA Regional Administrator by certified mail, of a voluntary or involuntary proceeding under Title 11 (Bankruptcy), U. S. Code, naming guarantor as debtor, within 10 days after commencement of the proceeding.

7. Guarantor agrees that within 30 days after being notified by an EPA Regional Administrator of a determination that guarantor no longer meets the financial test criteria or that he is disallowed from continuing as a guarantor of closure or post-closure care, he shall establish alternate financial assurance as specified in Subpart H of 40 CFR Parts 264 or 265, as applicable, in the name of Gulf & Western Manufacturing Company unless Gulf & Western Manufacturing Company has done so.

8. Guarantor agrees to remain bound under this guarantee notwithstanding any or all of the following: Amendment or modification of the closure or post-closure plan, amendment or modification of the permit, the extension or reduction of the time of performance of closure or post-closure, or any other modification or alteration of an obligation of the owner or operator pursuant to 40 CFR Parts 264 or 265.

9. Guarantor agrees to remain bound under this guarantee for so long as Gulf & Western Manufacturing Company must comply with the applicable financial assurance requirements of Subpart H of 40 CFR Parts 264 and 265 for the above-listed facilities, except that guarantor may cancel this guarantee by sending notice by certified mail to the EPA Regional Administrators for the Regions in which the facilities are located and to Gulf & Western Manufacturing Company, such cancellation to become effective no earlier than 120 days after receipt of such notice by both EPA and Gulf & Western Manufacturing Company as evidenced by the return receipts.

10. Guarantor agrees that if Gulf & Western Manufacturing Company fails to provide alternate financial assurance as specified in Subpart H of 40 CFR Parts 264 or 265, as applicable, and obtain written approval of such assurance from the EPA Regional Administrators within 90 days after a notice of cancellation by the guarantor is received by an EPA Regional Administrator from guarantor, guarantor shall provide such alternate financial assurance in the name of Gulf & Western Manufacturing Company.

11. Guarantor expressly waives notice of acceptance of this guarantee by the EPA or by Gulf & Western Manufacturing Company. Guarantor also expressly waives notice of amendments or modifications of the closure and/or post-closure plan and of amendments or modifications of the facility permits.

I hereby certify that the wording of this guarantee is identical to the wording specified in 40 CFR 264.151(h) as such regulations were constituted on the date first above written.

Effective date: July 1, 1982.

GULF & WESTERN INDUSTRIES, INC.

Robert L. Jones
Robert L. Jones, Senior Vice President
Resident Counsel & Secretary

Lucy R. Yacovino

LUCY R. YACOVINO
Notary Public, State of New York
No. 4618226 Westchester County
Certificate Filed in New York County
Commission Expires March 30, 1983

SCHEDULE OF EPA REGION I LOCATIONS

Closure and Post Closure Costs
for the 12 Months Beginning July 6, 1982

| <u>Name, Location and EPA No.</u> | <u>Closure Cost</u> | <u>Post Closure Cost</u> |
|---|---------------------|------------------------------|
| Collyer Insulated Wire 100 Higginson Avenue Lincoln, RI 02865 EPA ID No. RID051507648 | \$15,633 | |
| Morse Cutting Tools 163 Pleasant Street New Bedford, MA 02742 EPA ID No. MAD051505683 | 40,905 | |
| North & Judd 699 Middle Street Middletown, CT 06457 EPA ID No. CTD051320372 | 37,969 | \$5,211 |
| Wilcox - Crittendon (North & Judd) 56 Pameacha Avenue Middletown, CT 06457 EPA ID No. CTD000115618 | 2,605 | |
| | <hr/> \$97,112 | <hr/> \$5,211 |

SCHEDULE OF EPA REGION II LOCATIONS
Closure and Post Closure Costs
for the 12 Months Beginning July 6, 1982

| <u>Name, Location and EPA No.</u> | <u>Closure Cost</u> | <u>Post Closure Cost</u> |
|--|---------------------|------------------------------|
| Elco - Varicircuits Division 9268 Commerce Highway Pennsauken, NJ 08110 EPA ID No. NJD069016954 | \$ 3,897 | |
| Taylor Forge Stainless Readington Road, N. Branch Sommerville, NJ 08876 EPA ID No. NJD063144174 | 96,505 | |
| | <u>\$100,402</u> | |

SCHEDULE OF EPA REGION III LOCATIONS
Closure and Post Closure Costs
For the 12 Months Beginning July 6, 1982

| <u>Name, Location and EPA No.</u> | <u>Closure Cost</u> | <u>Post Closure Cost</u> |
|--|---------------------|------------------------------|
| Elco - Huntingdon Division Huntingdon Industrial Park Huntingdon, PA 16652 EPA ID No. PAD00309461 | \$ 5,211 | |
| Bonney Forge Division 827-31 N. Meadow Street Allentown, PA 18105 EPA ID No. PAD047354287 | 4,168 | |
| Bonney Forge Division - Huntingdon 18th and Penn Streets Huntingdon, PA 16652 EPA ID No. PAD005381538 | 834 | |
| | <hr/> | |
| | \$10,213 | |

SCHEDULE OF EPA REGION IV LOCATIONS
Closure and Post Closure Costs
For the 12 Months Beginning July 6, 1982

| <u>Name, Location and EPA No.</u> | <u>Closure Cost</u> | <u>Post Closure Cost</u> |
|--|---------------------|------------------------------|
| Glasgow Industries 1115 Cleveland Avenue Glasgow, KY 42141 EPA ID No. KYD008964934 | \$52,422 | |
| Taylor Forge (Woodstock) 5577 Taylor Drive Memphis, TN 38127 EPA ID No. TND070769831 | 14,591 | |
| G+W Taylor Forge Division Hwy. 12, W. Bus. Route Ackerman, MS 39735 EPA ID No. MSD067116178 | 26,054 | |
| | <hr/> \$93,067 | |

SCHEDULE OF EPA REGION V LOCATIONS
 Closure and Post Closure Costs
For the 12 Months Beginning July 6, 1982

| <u>Name, Location and EPA No.</u> | <u>Closure Cost</u> | <u>Post Closure Cost</u> |
|---|---------------------|------------------------------|
| Furniture City Mfg. 2555 Oak Ind. Dr. NE Grand Rapids, MI 49505 EPA ID No. MID055850200 | \$156,327 | |
| Furniture City Mfg. 33 State Street Middleville, MI 49333 EPA ID No. MID060197662 | 12,527 | |
| Michigan Plating & Stamping 1860 Alpine Avenue, NW Grand Rapids, MI 49504 EPA ID No. MID055850127 | 166,748 | |
| G+W Stamping Division - Plant 22 90-96 Railroad Street Mancelona, MI 49659 EPA ID No. MID060178688 | 218,180 | \$4,169 |
| G+W Stamping Division - Plant 23 117 S. Lake Street East Jordan, MI 49727 EPA ID No. MID060178092 | 4,325 | |
| Taylor Forge 4735 W. 14th Street Cicero, IL 60650 EPA ID No. ILD043905504 | 6,774 | |
| Bohn Aluminum & Brass - Plant 7 1625 E. Voorhees Street Danville, IL 61832 EPA ID No. ILD065247355 | 1,563 | |
| Eagle Signal Division 925 Lake Street Baraboo, WI 53913 EPA ID No. WID023146558 | 2,302 | |
| Monroe Steel Castings 917 W. Front Street Monroe, MI 48161 EPA ID No. MID020277760 | 51,275 | |
| SOLD, 4-82 | | |

| <u>Name; Location and EPA No.</u> | <u>Closure Cost</u> | <u>Post Closure Cost</u> |
|---|---------------------|------------------------------|
| Bohn Aluminum & Brass - Plant 6 Aylesworth and Indiana South Haven, MI 49090 EPA ID No. MID052866878 | \$ 28,660 | |
| Bohn Aluminum & Brass - Plant 9 Route #6 West Butler, IN 46721 EPA ID No. IND052867363 | 52,786 | |
| Bohn Aluminum & Brass - Plant 12 320 Center Street South Haven, MI 49090 EPA ID No. MID000775999 | 11,151 | |
| Bohn Aluminum & Brass - Plant 13 E. Maumee and Walbash RR Adrian, MI 49221 EPA ID No. MID063705990 | 110,940 | |
| Bohn Aluminum & Brass - Plant 15 Route 4, P.O. Box 387 Greensburg, IN 47240 EPA ID No. IND052959640 | 391,087 | |
| Bohn Aluminum & Brass - Plant 16 365 W. 24th Street Holland, MI 49423 EPA ID No. MID020899985 | 38,771 | |
| Bohn Metals, Piston Mach. - Plant 19 875 Brooks Avenue Holland, MI 49423 EPA ID No. MID000810663 | 7,256 | |
| | <hr/> \$1,260,672 | <hr/> \$4,169 |

SCHEDULE OF EPA REGION VI LOCATIONS
Closure and Post Closure Costs
For the 12 Months Beginning July 6, 1982

| <u>Name, Location and EPA No.</u> | <u>Closure Cost</u> | <u>Post Closure Cost</u> |
|---|---------------------|------------------------------|
| Eagle Signal Division 8004 Cameron Road Austin, TX 78753 EPA ID No. TXD030314618 | \$2,084 | |
| | <hr/> \$2,084 | |

GULF & WESTERN TECHNOLOGICAL CENTER

SCHEDULE OF EPA REGION VII LOCATIONS
Closure and Post Closure Costs
For the 12 Months Beginning July 6, 1982

Name, Location and EPA No.

Closure Cost

Post
Closure Cost

For → Eagle Signal Division
736 Federal Street
Davenport, IA 52803
EPA ID No. IAD051001337

\$3,606

\$3,606

SCHEDULE OF EPA REGION IX LOCATIONS
Closure and Post Closure Costs
For the 12 Months Beginning July 6, 1982

| <u>Name, Location and EPA No.</u> | <u>Closure Cost</u> | <u>Post Closure Cost</u> |
|---|---------------------|------------------------------|
| Elco - Pacific Division 2250 Park Place El Segundo, CA 90245 EPA ID No. CAD048340699 | \$ 1,563 | |
| H. Koch & Sons 5410 E. LaPalma Avenue Anaheim, CA 92807 EPA ID No. CAD066146481 | 10,422 | |
| | <u>\$11,985</u> | |